Kenneth L. Anderson, Attorney Towne Square, Suite 330 504 Main Street Lewiston, Idaho 83501 208/743-9569

N

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

In re:) Case No. 98-30052
WILLIAM SHANE MOORE, aka Shane Moore, and LYNN MARIE MOORE, fka Lynn Oliver,) AFFIDAVIT OF COUNSEL) RE ATTORNEY FEES AND) COSTS)
Debtors.	,)

STATE OF IDAHO, County of Nez Perce, ss:

COMES NOW THE UNDERSIGNED, who after being first duly sworn on oath deposes and says as follows:

I am attorney of record for debtor above-named.

The attachment hereto is a true and correct copy of the client's account as kept in our office for this proceeding and reflects a detailed itemization of reasonable attorney fees and costs necessarily incurred in representing the debtor's interests herein. Fees and costs to be allowed for payment by the trustee are \$ \frac{700^{\text{oc}}}{200^{\text{oc}}}\$ per attached records.

Professional time necessary for the completion of the Chapter 13 process and incurred on or after 1 January 1998 is charged and billed at \$120 per hour, plus costs.

(Prior to 1 January 1998, professional time was billed at the rate of \$100 per hour.

AFFIDAVIT OF COUNSEL RE ATTORNEY FEES AND COSTS -1-

Paralegal time is charged and billed at \$60 per hour.

Typically, in consumer Chapter 13 matters, a fee retainer of \$600 plus filing fee of \$160, total \$760, is collected prepetition and credited against fees to be charged.

The fee retainer may be higher in the case of a client with past or present business or other complex involvements.

Upon the occasion of an amended plan or motion to modify a confirmed plan, accumulated charges beyond those paid by the retainer are added to the administrative claim to be paid by the trustee upon approval by the court. If no amendment or modification is in order, but significant fees have accumulated, a motion to allow fees and costs may be filed. I do not solicit --and actively discourage-direct client payments outside this process during the term of the plan. However, any fees and costs remaining unpaid at the conclusion of the plan are then billed and collected directly after allowance by the court.

At my discretion, certain usual and ordinary costs (routine long distance and cellular telephone charges, charges for third-party proprietary research facilities such as the Matthew-Bender Bankruptcy CD-ROM library and online charges, copy machine expense, postage, mileage to Moscow, etc.) are absorbed into the fees; costs more significant in amount are itemized and claimed apart from fees.

The trustee herein has approved this procedure and reviews all fees and costs for reasonableness.

AFFIDAVIT OF COUNSEL RE ATTORNEY FEES AND COSTS -2-

Short history: Clients moved to Tennessee, surrendered vehicles to lessen moving costs, started new jobs which required I&J amendments as well as a modification of the plan to reflect new expenses and disposable income.

> Kenneth L. Anderson Attorney for Debtor

SUBSCRIBED AND SWORN TO before me this _____ day of December, 1998.

PUBLIC

Notary Public of the State of Idaho residing at Lewiston.

My commission expires... Kt 28 FE 2002 (Barb Suesz).

[] 31 JL 2004 (Bradee Miller)

Jarbara & Sees

Certificate of Service

I hereby certify that on the / JT day of December, 1998, I caused to be served a true and correct copy of the foregoing by first class mail, postage prepaid, on the following: Barry Zimmerman, Trustee, Box 1315, Coeur d'Alene ID 83816-1315, and Jeffrey Howe, Assistant U.S. Trustee, P.O. Box 110, Boise ID 83701.

AFFIDAVIT OF COUNSEL RE ATTORNEY FEES AND COSTS -3-

Date	1	1/30)/ <u>98</u>
Time	3	3:05	pm

Kenneth Anderson, Attorney at Law Client Billing Worksheet

Page 1

Nickname 1 : Moore, S&L Nickname 2 : 59

Address : Shane & Lynn Moore

2345 Lantanna Crossville, TN 38555

Phone 1 : 931 456 8633 In reference to : 98-30052 ch 13

Rounding : None
Full Precision : No

Last bill : 1/2/98 Last charge : 11/30/98

Last payment : 1/30/98 Amount : \$140.00

Arrangement : Time Charges: From slips.

Expenses: From slips.

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
1/16/98 #7587	Ken / Consultation Office Consultation; confer with parlegal re: changes in Sci 1&J, possible disposable income change and modification.	0.10 h 120.00	12.00	
1/29/98 #7757	Paralegal / Telephone Telephone Conversation; re refile of bcy, ch 13	0.20 60.00	12.00	
1/30/98 #7761	Paralegal / Consultation Office Consultation; ch 13 proceeding. \$300 to TA. \$210 due through plan	1.00 60.00	60.00	
2/2/98 #7851	Paralegal / Drafting Drafting Papers; refile ch 13. update schedules, statement of affairs, disclosure statment, cover memo. summaries and Voluntary petition.	2.00 60.00	120.00	
2/6/98 #7860	Ken / Correspondence Correspondence: review and revise petition and schedules prepared by paralegal (Sch DF&J)	0.30 120.00	36.00	
2/6/98 #7861	Ken / Drafting Drafting Papers; ch 13 plan and worksheet	1.30 120.00	156.00	
2/10/98 #7937	Paralegal / Telephone telephone conference: call from clients re payments and creditor with cars	0.20 60.00	12.00	
3/6/98 #8412	Paralegal / Telephone Telephone Conversation; call re her job She is unemployed but hunting work	0.10 60.00	6.00	
3/30/98 #8534	Ken / Correspondence Correspondence; receive and examine IRS proof of cliam (pri)	0.10 120.00	12.00	
4/6/98 #8583	Paralegal / Research Research; review and prep for 341a. Notes to atty.	0.20 60.00	12.00	
4/7/98 #8680	Ken / Court Court Appearance; 341a in Moscow including prorated	0.30 120.00	36.00	

Kenneth Anderson, Attorney at Law Client Billing Worksheet

Page 2

Moore, S&L

:Shane & Lynn Moore (continued)

Date/Slip#	<u>Description</u>	HOURS/RATE	AMOUNT	<u>TQTAL</u>
#8680	travel and costs			
5/1/98 #9119	Paralegal / Telephone Telephone Conversation; call from trustee re payments and request for skip Memo to client	0.20 60.00	12.00	
5/5/98 #9082	Paralegal / Research Research; proof of claim from Les Schwab	0.10 60.00	6.00	
5/14/98 #9156	Ken / Correspondence Correspondence; receive and examine secured PC from Schwab; check plan for adequate funding	0.10 120.00	12.00	
5/15/98 #9138	Ken / Consultation Office Consultation; confer with Lynn re problems with plan payments and need to amend schedules I&J and the plan	0.50 120.00	60.00	
5/21/98 #9187	Paralegal / Drafting Drafting Papers; amended ch 13 plan and amended schedule I&J	2.70 60.00	162.00	
5/26/98 #9292	Paralegal / Correspondence Correspondence; file prep for court, notes to atty.	0.10 60.00	6.00	
5/27/98 #9270	Ken / Court Court Appearance; confirmation hearing	0.30 120.00	36.00	
6/5/98 #9549	Paralegal / Telephone Telephone Conversation; Call from Trustee re payroll deduction. Attempt call to client, Send memo requesting information on payroll deduction and post petition purchases	0.20 60.00	12.00	
6/8/98 #9570	Paralegal / Telephone Telephone Conversation; call from client and to trustee re payroll deduction and plan payments	0.30 60.00	18.00	
7/27/98 #9972	Ken / Telephone Telephone Conversation; call from client re surrender of vehicle and possible modification	0.10 120.00	12.00	
8/19/98 #10114	Ken / Consultation Office Consultation; confere with Lynn re proposed modification including calls with Barry and Doug LaFord	0.50 120.00	60.00	
8/19/98 #10115	Ken / Drafting Drafting Papers; proof of claim for Doug LaFord (2) with attachments	0.40 0.00	0.00	
9/18/98 #10318	Ken / Consultation Office Consultation; confer with Lynn re move to TN and modificatio to plan	0.50 120.00	60.00	
9/18/98 #10319	Ken / Drafting Drafting Papers; motion to modify ch 13 plan	0.30 120.00	36.00	

Kenneth Anderson, Attorney at Law Client Billing Worksheet

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Moore, S&L

:Shane & Lynn Moore (continued)

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
10/2/98 #10676	Paralegal / Other Other Charges claims register analysis and 4 pc's	0.90 60.00	54.00	
10/26/98 #10823	Ken / Drafting Drafting Papers; motion and order to exten time; e mail to BZ	0.30 120.00	36.00	
10/26/98 #10839	Ken / Research Research; prep for modification hearing with paralegal BS	0.30 120.00	36.00	
10/27/98 #10815	Ken / Court Court Appearance; hearing in Moscow on modification including prorated travel and cost	0.40 120.00	48.00	
10/29/98 #10800	Paralegal / Correspondence Correspondence; memo to clients requesting new I&J information to be filed NST 11/24	0.10 60.00	6.00	
11/13/98 #11200	Paralegal / Telephone Telephone Conversation; call from client re I&J following move and new job acquisition. draft amened I&J and memo to KLA for review and possible conversion to CH 7	0.20 60.00	12.00	
11/13/98 #11205	Ken / Consultation Office Consultation; confer with papralegal BS to review draft of amended I&J and deal with shortfall of funding.	0.20 120.00	24.00	
11/30/98 #11329	Paralegal / Drafting Drafting Papers; Motion to modify and related calls to trustee and client, affidavit of fees, aff. of mailing, noticing and costs	1.50 60.00	90.00	
TOTAL BILLAB	LE TIME CHARGES	16.00		\$1,272.00
TOTAL BILLAB				\$0.00
TOTAL NEW CH	IARGES			\$1,272.00
PREVIOUS BALA	NCE			
120 days overdue			86.00	
TOTAL PREVIO TOTAL overdue:			-	\$86.00
PAYMENTS/REF	UNDS/CREDITS			
1/30/98	Payment - thank you; refile ch 13 proceeding. Deposit \$300 to TA. Checks to CUSBC for \$160 and to KLA for \$140. \$210 thru pl)	(140.00)	
5/13/98	Credit Order confirmign ch 13 plan and granting related motions. Transfer balance to ALS		(462.00)	

Kenneth Anderson, Attorney at Law Client Billing Worksheet

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Moore, S&L

:Shane & Lynn Moore (continued)

TOTAL PAYMENTS/REFUNDS/CREDITS

(\$602.00)

NEW BALANCE

New Current period

756.00

TOTAL NEW BALANCE

\$756.00

Date 11/30/98
<u>Time 3:05 pm</u>

Kenneth Anderson, Attorney at Law Detail Slip Listing

Page 1

Date / Start Time Reference Description	Slip#	Attorney Client Activity	Rate <u>Level</u>	<u>Time</u>	<u>Total</u>
1/17/97 Office Consultation; Initial conference with clients	5075	Paralegal Moore, S&L Consultation BILLED: #13265	90.00	1.00s	90.00
3/24/97 Office Consultation; Chapter 13 proceeding. \$710 to TA. Che CUSBC for \$160 and to KLA for \$550.		Paralegal Moore, S&L Consultation BILLED: #12260	100.00	8.50s	850.00
3/24/97 Office Consultation; Forms conference	5076	Paralegal Moore, S&L Consultation BILLED: #13265	90.00 1	1.00s	90.00
4/7/97 Drafting Papers; Voluntary petition, State of Affairs, Assets, Liabilities, Sched. G, H, I &J review, & prep for atty, numerous to clients		Paralegal Moore, S&L Drafting BILLED: #13265	60.00 1	4.70s	282.00
4/7/97 Drafting Papers; Review file, amend, prepare ch plan	6012	Paralegal Moore, S&L Drafting BILLED: #13265	90.00	1.30s	117.00
4/17/97 Drafting Papers; Add to Schedule F and matrix. Pay fee to CUS		Paralegal Moore, S&L Drafting BILLED: #13265	20.00	1.00s	20.00
4/28/97 Correspondence; Amend F and matrix. Notice out to new credit Filing fee with court	or.	Ken Moore, S&L Correspondence BILLED: #13265	60.00	0.70s	42.00

Date	1	1/30	/98	
Time	7	3:05	pm	

Kenneth Anderson, Attorney at Law Detail Slip Listing

Page 2

For time: s=spent e=estimated v=variance

Date / Start Time Reference Description Slip	Attorney Client Activity	Rate <u>Level</u>	<u>Time</u>	<u>Total</u>
5/8/97 Research; LCSC discriminatory conduct	Paralegal Moore, S&L Research BILLED: #13265	90.00	0.30s	27.00
7/9/97 Telephone Conversation; Call from client re: Blazer and Dept of Employment Claims		60.00 1	0.20s	12.00
7/10/97 Telephone; Call to and from Char at Blazer re: status of loan	Ken Moore, S&L Telephone BILLED: #13265	60.00 1	0.20s	12.00
	Ken Moore, S&L Telephone BILLED: #13265	100.00 1	0.20s	20.00
	8 Ken Moore, S&L Consultation BILLED: #13265	100.00 1	0.50s	50.00
	9 Ken Moore, S&L Drafting BILLED: #13265	100.00	0.90s	90.00
8/12/97 Court Appearance; Hearing on motion	Ken Moore, S&L Court	100.00	0.30s	30.00

BILLED: #13265

Date	1	1/30)/ <u>98</u>
Time	1	3:05	nm

Kenneth Anderson, Attorney at Law Detail Slip Listing

Page 3

Date / Start Time Reference Description Slip	_ 	Rate <u>Level</u> 60.00 1	<u>Time</u> 0.20s	<u>Total</u> 12.00
8/21/97 Drafting Papers; Amend Sched F, matrix, affidavit and mailing, plus fee to court	Paralegal	60.00 1	0.65s	39.00
8/25/97 Office Consultation	Ken Moore, S&L Consultation BILLED: #13265	100.00	0.00s	0.00
9/19/97 Other Charges; Claims Register Analysis	Paralegal Moore, S&L Other BILLED: #13265	60.00 1	0.40s	24.00
9/19/97 Drafting Papers; Draft 3 PC's not filing for secured claims	Paralegal Moore, S&L Drafting BILLED: #13265	60.00	0.30s	18.00
9/23/97 Telephone Conversation; PC with BZ re: Blazer claim	2 Ken Moore, S&L Telephone BILLED: #13265	100.00	0.20s	20.00
9/26/97 Telephone Conversation; Call to BZ re; Blazer claim and order of confirmation	0 Ken Moore, S&L Telephone BILLED: #13265	100.00 1	0.10s	10.00

Kenneth Anderson, Attorney at Law Detail Slip Listing

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Date / Start Time Reference Description Slips		Rate <u>Level</u> 100.00 1	<u>Time</u> 0.20s	<u>Total</u> 20.00
9/29/97 Correspondence; Visits with Char at Blazer and meo to clients re: Blazer payment arrangements.	BILLED: #13265 Paralegal Moore, S&L Correspondence BILLED: #13265	60.00 1	0.20s	12.00
10/9/97 Correspondence; Receive and examine letter from Department of Labor. Fax 341a and warning memo to dept. of labor.	Paralegal Moore, S&L Correspondence BILLED: #13265	60.00	0.10s	6.00
	Paralegal Moore, S&L Telephone BILLED: #13265	60.00 1	0.10s	6.00
10/16/97 Drafting Papers; Draft conf. order with amendments reflecting Blazer payment being made directly.	Paralegal Moore, S&L Drafting BILLED: #13265	60.00	0.30s	18.00
11/25/97 Correspondence; receive and examine TMTD. forward copy to client with memo	Paralegal Moore, S&L Correspondence BILLED: #13265	60.00	0.10s	6.00
	Ken Moore, S&L Telephone BILLED: #13265	100.00 1	0.10s	10.00

Date 11/30/98	
Time 3:05 pm	

Kenneth Anderson, Attorney at Law Detail Slip Listing

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Date / Start Time Reference Description	Slin#	Attorney Client	Rate	T:	T-4-1
12/8/97 Review and examine file to answwer questions re: TMTD, trusted objection to claim by Showroom, and payments to Blazer. Notes attorney	es	Activity Paralegal Moore, S&L Consultation BILLED: #13265	<u>Level</u> 60.00 1	<u>Time</u> 0.30s	<u>Total</u> 18.00
12/19/97 Office Consultation; review TMTD and related problems with paralegal	7415	Ken Moore, S&L Consultation BILLED: #13265	100.00	0.10s	10.00
1/16/98 Office Consultation; confer with parlegal re: changes in Sch I&J, possible disposable income change and modification.		Ken Moore, S&L Consultation	120.00 1	0.10s	12.00
1/29/98 Telephone Conversation; re refile of bcy, ch 13	7757	Paralegal Moore, S&L Telephone	60.00 1	0.20s	12.00
1/30/98 Office Consultation; ch 13 proceeding. \$300 to TA. \$210 due through plan	7761	Paralegal Moore, S&L Consultation	60.00 1	1.00s	60.00
2/2/98 Drafting Papers; refile ch 13. update schedules, statement of affa disclosure statment, cover memo. summaries and Voluntary petition	iirs,	Paralegal Moore, S&L Drafting	60.00	2.00s	120.00
2/6/98 Correspondence: review and revise petition and schedules prepar by paralegal (Sch DF&J)		Ken Moore, S&L Correspondence	120.00 1	0.30s	36.00
2/6/98 Drafting Papers; ch 13 plan and worksheet	. 786 1	Ken Moore, S&L Drafting	120.00	1.30s	156.00

Kenneth Anderson, Attorney at Law Detail Slip Listing

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Date / Start Time Reference Description Slip#	Attorney Client Activity cont.	Rate <u>Level</u>	Time	<u>Total</u>
2/10/98 telephone conference: call from clients re payments and creditor with cars	Paralegal Moore, S&L Telephone	60.0 <mark>0</mark> 1	0.20s	12.00
	Paralegal Moore, S&L Telephone	60.00 1	0.10s	6.00
3/30/98 Correspondence; receive and examine IRS proof of cliam (pri)	Ken Moore, S&L Correspondence	120.00 1	0.10s	12.00
	Paralegal Moore, S&L Research	60.00 1	0.20s	12.00
	Ken Moore, S&L Court	120.00 1	0.30s	36.00
5/1/98 Telephone Conversation; call from trustee re payments and request for skip Memo to client	Paralegal Moore, S&L Telephone	60.00 1	0.20s	12.00
	Paralegal Moore, S&L Research	60.00 1	0.10s	6.00

Kenneth Anderson, Attorney at Law <u>Detail Slip Listing</u>

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Date / Start Time Reference Description Slip# 9156 5/14/98 Correspondence; receive and examine secured PC from Schwab; check plan for adequate funding	Attorney Client Activity Ken Moore, S&L Correspondence	Rate <u>Level</u> 120.00 1	<u>Time</u> 0.10s	<u>Total</u>
5/15/98 Office Consultation; confer with Lynn re problems with plan payments and need to amend schedules I&J and the plan	Ken Moore, S&L Consultation	120.00 1	0.50s	60.00
5/21/98 Drafting Papers; amended ch 13 plan and amended schedule I&J	Paralegal Moore, S&L Drafting	60.00 I	2.70s	162.00
5/26/98 Correspondence; file prep for court, notes to atty.	Paralegal Moore, S&L Correspondence	60.00 1	0.10s	6.00
5/27/98 Court Appearance; confirmation hearing	Ken Moore, S&L Court	120.00 1	0.30s	36.00
6/5/98 Telephone Conversation; Call from Trustee re payroll deduction. Attempt call to client, Send memo requesting information on payroll deduction and post petition purchases	Paralegal Moore, S&L Telephone	60.00 1	0.20s	12.00
6/8/98 Telephone Conversation; call from client and to trustee re payroll deduction and plan payments	Paralegal Moore, S&L Telephone	60.00 1	0.30s	18.00
7/27/98 Telephone Conversation; call from client re surrender of vehicle and possible modification	Ken Moore, S&L Telephone	120.00 1	0.10s	12.00

Kenneth Anderson, Attorney at Law Detail Slip Listing

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Date / Start Time Reference Description Slip#	Attorney Client Activity	Rate <u>Level</u>	<u>Time</u>	<u>Total</u>
8/19/98 Office Consultation; confere with Lynn re proposed modification including calls with Barry and Doug LaFord	Ken Moore, S&L Consultation	120.00	0.50s	60.00
8/19/98 Drafting Papers; proof of claim for Doug LaFord (2) with attachments	Ken	0.00	0.40s	0.00
9/18/98 Office Consultation; confer with Lynn re move to TN and modificatio to plan	Ken Moore, S&L Consultation	120.00 I	0.50s	60.00
9/18/98 Drafting Papers; motion to modify ch 13 plan	Ken Moore, S&L Drafting	120.00 1	0.30s	36.00
	Paralegal Moore, S&L Other	60.00 1	0.90s	54.00
10/26/98 Drafting Papers; motion and order to exten time; e mail to BZ	Ken Moore, S&L Drafting	120.00 1	0.30s	36.00
0/26/98 Research; prep for modification hearing with paralegal BS	Ken Moore, S&L Research	120.00 I	0.30s	36.00
	Ken Moore, S&L Court	120.00 1	0.40s	48.00

Date:	1	1/30	0/98
Time			

Kenneth Anderson, Attorney at Law Detail Slip Listing

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For time: s=spent e=estimated v=variance

Date / Start Time Reference Description Slip#	Attorney Client Activity	Rate <u>Level</u>	Time	<u>Total</u>
10800 10/29/98 Correspondence; memo to clients requesting new I&J information to be filed NST 11/24	Paralegal Moore, S&L Correspondence	60.00	0.10s	6.00
11/13/98 Telephone Conversation; call from client re I&J following move and new job acquisition. draft amened I&J and memo to KLA for review and possible conversion to CH 7	Paralegal Moore, S&L Telephone	60.00	0.20s	12.00
11/13/98 Office Consultation; confer with papralegal BS to review draft of amended I&J and deal with shortfall of funding.	Ken Moore, S&L Consultation	120.00 I	0.20s	24.00
11/30/98 Drafting Papers; Motion to modify and related calls to trustee and client, affidavit of fees, aff. of mailing, noticing and costs	Paralegal Moore, S&L Drafting	60.00 1	1.50s	90.00

GRAND TOTAL

Attorney	40.1 5s	3233.00
Client		0.00
Activity		0.00
Billable	40.15	3233.00
Unbillable		0.00

Date	1	1/30)/98
Time	1	3:04	pm

Kenneth Anderson, Attorney at Law Transaction Listing

Page 1

(tax not included, *=transaction has been billed)

Client	<u>Date</u>	Description	Amount
Moore, S&L	3/24/97	Payment - thank you; additional \$60 to be paid through plan.	490.00*
	10/29/97	Credit order confirming amended chapter 13 plan dated 11 august and granting related motions with amendment. transfer ALS	835.00*
	1/30/98	Payment - thank you; refile ch 13 proceeding. Deposit \$300 to TA. Checks to CUSBC for \$160 and to KLA for \$140. \$210 thru pl	140.00
	5/13/98	Credit Order confirmign ch 13 plan and granting related motions. Transfer balance to ALS	462.00
GRAND TOTAL	——————————————————————————————————————	PAYMENTS	630.00
		CREDITS	1297.00